

Message

From: Able, Tony [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=08873E26CCD44323B0F6AB96E0E8FADA-ABLE, ANTHONY]
Sent: 9/11/2020 9:29:59 PM
To: Gordon, Lisa Perras [Gordon.Lisa-Perras@epa.gov]
CC: Bouma, Stacey [Bouma.Stacey@epa.gov]
Subject: RE: GA Narrative Example

Per our conversation let's talk Monday.

THIS IS JUST A NOTE TO MYSELF TO LOCK IN MY UNDERSTANDING - KY's letter and Our approval would show Mary that we work with states to document new narrative changes under 131.6. It is an example of what we gave GA when we said we needed more info from them on how they will interpreted "unreasonably"

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From: Gordon, Lisa Perras <Gordon.Lisa-Perras@epa.gov>
Sent: Friday, September 11, 2020 3:07 PM
To: Able, Tony <Able.Tony@epa.gov>
Cc: Cooper, Jamal <cooper.jamal@epa.gov>; Wetherington, Michele <Wetherington.Michele@epa.gov>; Bouma, Stacey <Bouma.Stacey@epa.gov>
Subject: GA Narrative Example

Tony, Attached is the example that we sent to EPD of how KY interpreted their nutrient narrative criteria. In meeting with EPD, we noted that we couldn't provide exact info on what Georgia needed to submit, because that would involve us interpreting the standard for them. The regulations require that the State needed to provide what methods and analysis they used and the information on how it protects the designated use. In EPA's October 2018, Section 131.6 letter that we sent to the State, we further clarified that they should include the required information for each of the parameters (e.g. oil, scum, color, turbidity, odor from municipal and industrial sources), so that they could be sure to include that, as well. The information on oil, for instance, could be very different from an analysis on odor. Lisa

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